IN THE UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF TENNESSEE EASTERN DIVISION

IN RE: AME CHURCH EMPLOYEE RETIREMENT FUND LITIGATION

MDL Docket No. 1:22-md-03035-STA-jay ALL CASES

Honorable S. Thomas Anderson

JOINT UPDATE TO THE COURT REGARDING DEPOSITION SCHEDULING

At the May 3, 2024 status conference, the Parties reported issues to the Court pertaining to the scheduling of depositions that had been noticed to take place the week of May 13. In particular, the parties raised issues pertaining to the depositions of defendant Rodney Brown, a Rule 30(b)(6) deposition of defendant Financial Freedom Group, Inc., and a deposition of Newport employee Dennis Kass. The Court ordered the Parties to meet and confer on the scheduling of those depositions and file a notice within 10 days as to whether they were able to resolve these scheduling issues. [ECF No. 391]. The Parties report that they were able to work out the scheduling issues pertaining to these three depositions. Mr. Brown's deposition will take place on May 23, Mr. Kass's deposition will take place on June 13, and the Rule 30(b)(6) deposition of Financial Freedom Group, Inc. will take place on June 26. The parties expect additional depositions may still be scheduled and will endeavor to work cooperatively as to the scheduling of those depositions.

Respectfully submitted this the 13th day of May 2024.

/s/ Matthew E. Lee

MILBERG COLEMAN BRYSON PHILLIPS GROSSMAN, PLLC

900 W. Morgan Street Raleigh, NC 27603 919-600-5000 Fax: 919-600-5035 mlee@milberg.com

Gregorio A. Francis

OSBORNE & FRANCIS LAW FIRM, PLLC

433 Plaza Real, Suite 271 Boca Raton, FL 33432 (561) 293-2600 Fax: (561) 923-8100 gfrancis@realtoughlawyers.com

Interim Co-Lead Counsel

J. Gerard Stranch, IV BRANSTETTER, STRANCH & JENNINGS, PLLC

223 Rosa L. Parks Avenue, Suite 200 Nashville, Tennessee 37203 (615) 254-8801 Fax: (615) 255-5419 gerards@bsjfirm.com

Liaison Counsel

Dhamian Blue

BLUE LLP

P.O. Box 1730 Raleigh, NC 27602 919-833-1931 Fax: 919-833-8009

dab@bluellp.com

Richard Schulte

WRIGHT & SCHULTE LLC

Benjamin Michael Stoll Markham Richard Leventhal Nathaniel G. Foell

CARLTON FIELDS, P.A.

1025 Thomas Jefferson Street, NW Suite 400 West Washington, DC 20007 t: 202-965-8189 f: 202-965-8104 bstoll@carltonfields.com mleventhal@carltonfields.com nfoell@carltonfields.com

Counsel for Symetra Life Insurance Company and Symetra Financial Corporation

Sean C. Abouchedid Lars C. Golumbic Shaun A. Gates Mark Nielsen

GROOM LAW GROUP, CHARTERED

1701 Pennsylvania Ave NW, Ste 1200 Washington, DC 20006 t: 202-861-6605 sabouchedid@groom.com lgolumbic@groom.com sgates@groom.com mnielsen@groom.com

Counsel for Newport Group, Inc.

Bruce McMullen Mary Wu Tullis Jennie Vee Silk

BAKER, DONELSON, BEARMAN, CALDWELL & BERKOWITZ, P.C.

165 Madison Ave., Ste 2000 Memphis, TN 38103 t: 901-577-2356 865 S. Dixie Dr. Vandalia, OH 45377 937-435-9999 Fax: 937-435-7511 rschulte@yourlegalhelp.com

Dean Graybill **AARP Foundation**601 E Street. NW

Washington, DC 20049 (202) 434-6280 Fax: (202) 434-6424 dgraybill@aarp.org

Kenneth S. Byrd LIEFF CABRASER HEIMANN & BERNSTEIN, LLP

222 2nd Ave S Nashville, TN 37210 615-313-9000 Fax: 615-313-9965 kbyrd@lchb.com

Elizabeth Hopkins

KANTOR & KANTOR LLP

19839 Nordhoff Street Northridge, CA 91324 818-886-2525 Fax: 818-350-6274 ehopkins@kantorlaw.net

Plaintiffs' Steering Committee

f: 901-577-2303 bmcmullen@bakerdonelson.com mtullis@bakerdonelson.com jsilk@bakerdonelson.com

Counsel for the AMEC Defendants

Gadson W. Perry
BUTLER SNOW LLP
6075 Poplar Ave., Suite 500
Memphis, TN 38119
t: 901-680-7200
keenan.carter@butlersnow.com
will.perry@butlersnow.com

Samuel Keenan Carter

Counsel for Jerome V. Harris

Clarence A. Wilbon

Perry A. Craft

John Davis Woods, III
Roscoe Green
ADAMS AND REESE, LLP
6075 Poplar Avenue, Suite 700
Memphis, TN 38119
t: 901-524-5324
f: 901-524-5414
clarence.wilbon@arlaw.com
john.woods@arlaw.com
roscoe.green@arlaw.com

Counsel for Financial Freedom Group, Inc.

LAW OFFICE OF PERRY A. CRAFT, PLLC 402 BNA Drive, Building 100, Suite 402 Nashville, TN 37217 t: 615-953-3808 f: 615-739-6292 perrycraft@craftlegal.com

Counsel for Jarrod Erwin